February 12, 2014

Ken Alex, Director
Governor's Office of Planning and Research
1400 10th Street
Sacramento, California
95812-3044

Via email: ceqa.guidelines@ceres.ca.gov

Re: Preliminary Evaluation of Alternative Methods of Transportation Analysis for CEQA

Dear Mr. Alex:

Thank you for the opportunity to provide comments and suggestions regarding your efforts to amend CEQA (California Environmental Quality Act) Guidelines, as required by Senate Bill 743 (SB 743). This letter specifically responds to the Preliminary Evaluation of Alternative Methods of Transportation Analysis written by the Office of Planning and Research (OPR) dated December 30, 2013.

Move San Diego is merging with Walk San Diego this month to become Circulate San Diego. Our non-profit mission is "*To create excellent mobility choices and vibrant, healthy neighborhoods.*"

In order to respond to OPR's request for information, we gathered several of our members who are experienced traffic engineers and planners to help provide recommendations to consider for removing automobile congestion related LOS. We listened to transportation and sustainable community advocates, and attempted to have a broad viewpoint on this topic. We share the desire of the state to encourage more multi modal travel behavior, within transit priority areas, in order to reduce greenhouse gasses.

We recommend that OPR further analyze Vehicle Miles Traveled (VMT) for replacing automobile congestion related LOS. VMT is straightforward to analyze, captures the effects of regional location, and indirectly accounts for the benefits of active transportation and transit projects. Importantly, VMT's inclusion in CEQA would align project-level decisions with the state's larger planning framework, notably SB 375, and with regional policies and investment priorities embedded in the RTP/SCS. That being said, we are concerned regarding the data collection and modeling needed to make this metric workable for localities.

We also have concerns about the accuracy of models in San Diego to calculate VMT for development projects. Furthermore, thresholds would need to be developed for impact evaluation.

We do want to note that automobile congestion related LOS is problematic for environmental review, but LOS analyses for other modes of travel (transit, bicycle, and pedestrian) may be helpful in promoting the reduction of greenhouse gases.

We look forward to OPR's work on this issue and guidelines you will create, especially regarding thresholds of significance. We also would expect that some differentiation between smaller projects and larger ones be recognized, so that having to resort to regional models and the cost and complexity does not always have to be incurred for minor projects.

We want to make sure there is a funding nexus to allow for private development to pay for infrastructure improvements that are multi modal. It is recommended that the financial responsibilities for local agencies to fund transportation improvements be taken into account. The new guidelines should not require a change to VMT as a performance measure that would shift all financial responsibility from the private developers to the public agencies who have extremely limited financial resources to address these development-related impacts.

Lastly, we want to urge you to ensure that *all* projects, including land use and transportation projects of all sizes, are subject to the same transportation analysis standards under CEQA. Whether a bike lane or a bypass, a stadium or a shopping center, any CEQA project that may have transportation-related impacts should use consistent metrics for evaluating those impacts. I can be reached at 619-544-9255 xt 310 for more info.

Sincerely,

/s/

Elyse Lowe
Deputy Executive Director
Move/Walk SD